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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 *****

11 PAMELA DITTMAR,
12
13 Plaintiff,

14 v.

15 CITY OF NORTH LAS VEGAS, a municipal
16 corporation,
17 Defendant.

Case No. 2:17-cv-02916-JAD-BNW

**STIPULATION TO EXTEND
DISPOSITIVE MOTION DEADLINE,
RESPONSE DEADLINES, AND REPLY
DEADLINES**

(THIRD REQUEST)

18
19 NOW COMES the Plaintiff, Pamela Dittmar, by and through her attorneys, Melanie A.
20 Hill and Melanie Hill Law PLLC, and Defendant, City of North Las Vegas, by and through its
21 attorneys, R. Todd Creer, Kaitlin H. Paxton, and Kamer Zucker Abbott, who hereby stipulate that
22 the dispositive motion deadline of April 1, 2021 be extended up to and including April 12, 2021 for
23 Plaintiff.

24 This is the third request for an extension of the dispositive motion deadline. The first request
25 was by stipulation to extend the dispositive motion deadline thirty (30) days from the extended
26 discovery cutoff deadline to complete the remaining two depositions. The second request was by
27 motion due to Plaintiff's counsel's ongoing illness with Covid-19 symptoms. This third request is
28 due to Plaintiff's counsel's immediate family member's emergency hospitalization for nearly one

1 week. This Stipulation is made at the request of Plaintiff's counsel for the reasons set forth herein
2 and this is the third stipulation for an extension of the dispositive motion deadline.

3 In support of this Stipulation and Order, the parties state as follows:

4 1. The current deadline to file dispositive motions is April 1, 2021. When the parties
5 first entered into a stipulation to extend the dispositive motion deadline, it was to extend the
6 dispositive motion deadline to thirty (30) days from the extended discovery cutoff deadline to
7 complete the remaining two depositions. When the parties next entered into a stipulation to extend
8 the dispositive motion deadline, it was to extend the dispositive motion deadline thirty (30) days
9 due to Plaintiff's counsel's ongoing illness with Covid-19 symptoms.

10 2. Counsel for Plaintiff and counsel for Defendant met and conferred last week about
11 Plaintiff's counsel's immediate family member's emergency hospitalization for nearly one week,
12 Plaintiff's counsel's daughter being off school this week for Easter break with Plaintiff's counsel as
13 her primary caregiver, and the need for a final extension to complete the dispositive motion.

14 3. Defendant is sympathetic to Plaintiff's counsel's immediate family member's health
15 emergency hospitalization and recognizes the difficulties with the same and her daughter being
16 home from school this week. In that regard, Defendant has entered this stipulation so long as it is not
17 prejudiced in preparing its briefs so the parties have also agreed to extend the response and reply
18 deadlines.

19 4. The parties have agreed to extend the dispositive motion deadline to April 12, 2021.
20 The parties have further agreed to extend the response deadline to file responses to the dispositive
21 motions until May 7, 2021. The parties have further agreed that replies will be due on May 28,
22 2021. No other deadlines are being extended by this stipulation, such as the deadline for discovery
23 and to file a motion to compel written discovery.

24 5. This stipulation to extend the dispositive motion deadline is brought in good faith,
25 with a showing of good cause, and is not sought for any improper purpose or other purpose of
26 delay, but to allow counsel for the Plaintiff additional time file her dispositive motion due to her
27 immediate family member's health emergency hospitalization and her daughter being home from
28 school this week. The seven-day extension excluding the weekends will allow counsel the

1 additional time necessary to finalize Plaintiff's dispositive motion.

2 WHEREFORE, the parties respectfully request by this stipulation that the Court extend
3 the dispositive motion deadline of April 1, 2021 up to and including April 12, 2021. The parties
4 further request that the Court extend the deadline to file responses to the dispositive motions until
5 May 7, 2021 and the deadline to file replies to May 28, 2021.

6 DATED this 29th day of March, 2021.

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8 MELANIE HILL LAW PLLC

KAMER ZUCKER ABBOTT

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17 IT IS SO ORDERED:

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19 BREND A WEKSLER
20 UNITED STATES MAGISTRATE JUDGE

21 Dated: 4/2/2021